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September 26, 2022

Via ECF Honorable Lewis A. Kaplan United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: United States v. Oscar Abreu 22-CR-400 (LAK)

Dear Judge Kaplan:

I represent Oscar Abreu in the above matter. We have a Pre-trial conference (PTC) scheduled before Your Honor on September 29, 2022. The defense just received discovery in this matter last week, on September 22, 2022. We have not had a sufficient opportunity to thoroughly review it and to discuss it with our clients. Therefore, I am respectfully requesting that Your Honor adjourn the PTC for 60 days in order to give the defense ample time to review the discovery. The Government, Brandon D. Harper, and Co-defendant's counsel, Zachary Taylor, Esq., have no objection to this request. Thank you for Your Honor's time and consideration to this request.

> Respectfully submitted. s/ Lorraine Gauli-Rufo Lorraine Gauli-Rufo

Attorney for Osparwingen, KAP

cc: All Counsel of Record